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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 18, U.S.C., § 2252(a)(4)(B))

KEVIN BELL,

Case No. 18-M-1156

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

Krista Cousins, being duly sworn, deposes and states that she is a Special Agent with the U.S. Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about November 28, 2018, the defendant KEVIN BELL did knowingly possess one or more books, magazines, periodicals, films, video tapes, and other matter which contain any visual depiction, the production of such visual depiction having involved the use of one or more minors engaging in sexually explicit conduct and such visual depiction was of such conduct, that has been mailed, and has been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials which have been mailed and so shipped and transported, by any means including by computer.

(Title 18, United States Code, Section 2252(a)(4)(B)).

1. The source of your deponent's information and the grounds for her belief

are as follows:<sup>1</sup>

2. I have been a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”) since November 2017, and am currently assigned to the New York Office. Since June 2018, I have been assigned to the Child Exploitation Investigation Unit. Prior to joining HSI, I was a Detective with the Minot Police Department in Minot, North Dakota, where I investigated child exploitation crimes. At HSI, I have been assigned to investigate violations of criminal law relating to the sexual exploitation of children. I have gained expertise in this area through training in classes and daily work related to conducting these types of investigations. As part of my responsibilities, I have been involved in the investigation of numerous child pornography cases and have reviewed thousands of photographs depicting children (less than 18 years of age) being sexually exploited by adults. Through my experience in these investigations, I have become familiar with methods of determining whether a child is a minor.

3. I am familiar with the information contained in this Complaint based on my own personal participation in the investigation, my review of documents, my training and experience and discussions that I have had with other law enforcement personnel concerning the creation, distribution and proliferation of child pornography. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

4. In or about October 2018, law enforcement began investigating a user who had uploaded child pornography materials to an online website (the “Website”). Law enforcement officers reviewed approximately 11 of the images that had been uploaded and confirmed that the images depicted child pornography. Specifically, the images depicted pre-pubescent female minors between the approximate ages of 4 and 10 years old. The images depict the female children exposing their breasts and vaginas, with their legs spread, in sexually suggestive poses. In all of the images, the focus was on the vagina or anus of the minor victim. For example, in one photo, a pre-pubescent female child is laying down nude with her legs spread, with a mature male placing his finger inside her vagina.

5. Records from the Website indicated that the images of child pornography were uploaded by a user with the account name “Kimo K Bell.” Additionally, records from the Website indicate that the “Kimo K Bell” account was accessed by an individual utilizing IP address 24.188.176.34. Using open source information, law enforcement officers were able to trace IP address 24.188.176.34 to defendant KEVIN BELL’s residence in Brooklyn, New York.

6. On or about November 28, 2018, law enforcement officers executed a search warrant for child pornography, electronic devices, and other items at KEVIN BELL’s residence. Law enforcement officers seized approximately 18 electronic devices from KEVIN BELL’s residence, including hard drives, laptop computers, tablets, cellular telephones, external thumb drives, and other items.

7. Pursuant to the warrant, law enforcement officers have reviewed the content contained on one of the aforementioned electronic devices, a MacBook Pro laptop

computer bearing serial number C02PXDW2G8WP (the “MacBook”). Law enforcement officers have observed at least 500 files containing videos or images of child pornography on the MacBook. I have reviewed several of the files containing videos of child pornography, which files are described as follows:


- a. An image of a female child, approximately 3-4 years old, laying on her side naked while a mature male penetrates her anus with his penis. The focus of the image is on the penetration and on the child’s vagina.
- b. An image of a female child, approximately 6-9 years old, naked on her hands and knees while a mature male penetrates her anus. The focus of the image is on the penetration and on the child’s vagina.
- c. A GIF<sup>2</sup> of a female child, approximately 6-10 years old, wearing only a top. The GIF shows a mature male penetrating the child’s vagina. The focus of the GIF is on the penetration.

8. During the course of the search of KEVIN BELL’s residence, an individual present identified himself as “Kevin Bell.” KEVIN BELL was read his Miranda rights, which he waived. KEVIN BELL subsequently stated, in sum and substance and in part, that he had downloaded child pornography multiple times over the past four years; the child pornography consisted mostly of minor females; and he was aware that some of the videos and images that he downloaded were of minors engaged in sexual activity. KEVIN BELL also admitted that he controlled an email address that I know to be associated with the “Kimo K Bell” account on the Website. KEVIN BELL further acknowledged that the electronic devices seized during the search, including the MacBook, and the child pornography contained on them, belonged to him.

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<sup>2</sup> A GIF is an image file with the extension “.gif” that is animated by combining several other images or frames into a single file. The multiple images within a single GIF file are displayed in succession to create a short clip or movie.

WHEREFORE, your deponent respectfully requests that the defendant KEVIN BELL be dealt with according to law.

  
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KRISTA COUSINS  
Special Agent  
United States Department of Homeland Security,  
Homeland Security Investigations

Sworn to before me this  
29th day of November, 2018

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/s/ RML

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THE HONORABLE ROBERT M. LEVY  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK